

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>ADMIIN INC. d/b/a PARO INC.,</b>	)	
<b>A Delaware Corporation,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 1:23-cv-4430</b>
	)	
<b>v.</b>	)	
	)	
<b>LUKE KOHAN an individual,</b>	)	
<b>and FIRMKEY SOLUTIONS LLC,</b>	)	
	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF’S MOTION FOR EXPEDITED DISCOVERY**

Plaintiff, Admiin Inc. d/b/a Paro Inc. (“Paro” or the “Company”), by its undersigned attorneys, respectfully moves this Court for entry of an order permitting expedited discovery in the above-captioned matter. In support of this Motion, Paro states as follows:

1. Paro filed a Verified Complaint for Injunctive and Other Relief (the “Complaint”) and a Rule 65 Motion for Temporary Restraining Order and Preliminary Injunction (the “TRO Motion”) against Defendants Luke Kohan (“Kohan”) and FirmKey Solutions LLC (“FirmKey”) alleging, among other things, that (a) Kohan has breached the terms of his restrictive covenant agreement with Paro by founding and working for FirmKey, a direct competitor of Paro; (b) Kohan and FirmKey have misappropriated or are threatening to misappropriate Paro’s confidential information and trade secrets; and (c) FirmKey has tortiously interfered with Paro’s and Kohan’s contractual relationship.

2. As fully set forth in the Memorandum of Law in support of the TRO Motion, injunctive relief is necessary to prevent Kohan’s ongoing breaches of his contractual obligations to Paro and Kohan’s and FirmKey’s other wrongdoing.

3. Paro should be permitted to engage in discovery in connection with the emergency relief it is seeking. *E.g., Pughsley v. 3750 Lake Shore Drive Coop. Building*, 463 F.2d 1055 (7th Cir. 1972); *see also Nobel Biocare USA, Inc. v. Lynch*, 1999 WL 958501 (N.D. Ill. 1999) (granting motion for expedited discovery, as it provides a fuller record for the court when deciding request for preliminary injunction). Expedited discovery is particularly appropriate in a case such as this – where Kohan has founded a direct competitor of Paro, and Kohan and FirmKey have obtained Paro’s confidential information – to explore the scope of Kohan’s and FirmKey’s wrongful conduct and to avoid future irreparable injury. *See Regal-Beloit Corp. v. Drecoll*, 955 F. Supp. 849 (N.D. Ill. 1996) (to avoid irreparable injury, discovery and preliminary injunction proceedings were ordered to occur on an expedited basis); *Lee and Everfresh v. John Labatt Ltd.*, 1992 WL 6697, \*2 (N.D. Ill. 1992) (allowing parties to conduct expedited discovery so that they could prepare more fully for the preliminary injunction hearing).

4. Given the verified allegations concerning Kohan’s and FirmKey’s misconduct, Paro has demonstrated good cause for expedited discovery in this matter. Further, neither Kohan nor FirmKey will be prejudiced in any way by responding to requested discovery; the information will be relevant, easy to gather by Kohan and FirmKey, and there is no good reason why such materials cannot be produced promptly. Permitting expedited discovery will further the interests of justice and judicial economy, including by ensuring that a more complete record may be developed by the parties at future hearings.

WHEREFORE, Admiin Inc. d/b/a Paro Inc. respectfully requests that this Court permit it to take expedited discovery.

Dated: July 10, 2023

Respectfully submitted,

**ADMIN INC. d/b/a PARO INC.**

By: /s/ Chad W. Moeller  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that she served a copy of the foregoing Plaintiff's

Motion for Expedited Discovery on:

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by email, FedEx Overnight and messenger on this 10th day of July, 2023.

/s/ Collette A. Woghiren  
One of the Attorneys for Admiin Inc. d/b/a Paro Inc.

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